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UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In Re:

USA COMMERCIAL MORTGAGE
COMPANY,

USA CAPITAL REALTY ADVISORS, LLC,
USA CAPITAL DIVERSIFIED TRUST DEED
FUND, LLC, USA CAPITAL FIRST TRUST
DEED FUND, LLC, USA SECURITIES, LLC,
Debtors.

Affects:

☐ All Debtors

☒ USA Commercial Mortgage Company

☐ USA Capital Realty Advisors, LLC

☐ USA Capital Diversified Trust Deed Fund,
LLC

☐ USA Capital First Trust Deed Fund, LLC

☐ USA Securities, LLC

Case No. BK-S-06-10725-LBR

Case No. BK-S-06-10726-LBR

Case No. BK-S-06-10727-LBR

Case No. BK-S-06-10728-LBR

Case No. BK-S-06-10729-LBR

CHAPTER 11

Jointly Administered Under

Case No. BK-S-06-10725 LBR

**STIPULATION TO EXTEND
DEADLINE TO FILE COMPLAINT
TO AVOID AND RECOVER PRE-
PETITION TRANSFERS PURSUANT
TO 11 U.S.C. §§ 547, 548 AND 550**

USACM Liquidating Trust (the "Trust"), and Special Order Systems, Inc. ("Special
Order Systems," together with the Trust, the "Parties"), by and through their undersigned
counsel, hereby stipulate to extend the deadline for the Trust to file a complaint to avoid

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1 and recover pre-petition transfers pursuant to 11 U.S.C. §§ 547, 548, and 550 (the
2 “Stipulation”) against Special Order Systems. In support of this Stipulation, the Parties
3 state as follows:

4 1. The Trust asserts that it has claims against Special Order Systems for the
5 avoidance and recovery of preferential and/or fraudulent pre-petition transfers (the
6 “Transfers”) received from USA Commercial Mortgage (“USACM”) by Special Order
7 Systems during the 90-day period preceding the filing of USACM’s chapter 11 bankruptcy
8 case on April 13, 2006 (the “Petition Date”).

9 2. On February 12, 2008, in pursuit of its avoidance claims, the Trust made
10 demand upon Special Order Systems for the return of the Transfers. Counsel for Special
11 Order Systems responded to the Trust’s demand detailing USACM’s historical payments
12 to Special Order Systems, and the Parties are currently engaged in settlement negotiations.

13 3. The current deadline for the Trust to file a complaint to avoid and recover
14 the Transfers, pursuant to 11 U.S.C. §§ 547, 548, and 550 (the “Complaint”), is April 12,
15 2008.

16 4. In order to finalize the ongoing settlement negotiations, the Parties have
17 agreed that an extension of the deadline for filing a Complaint is warranted.

18 5. The Parties submit that an extension to Monday, May 12, 2008, of the
19 deadline for filing a Complaint is reasonable and will effectively conserve the Court’s
20 valuable resources and serve the efficiencies of this matter by allowing additional time to
21 finalize a resolution of the Trust’s avoidance claims against Special Order Systems.

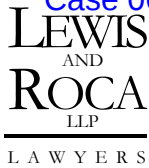
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WHEREFORE, the Parties request that the Court enter an order approving this Stipulation and extending the deadline, to and including Monday, May 12, 2008, for the Trust to file a Complaint against Special Order Systems.

Respectfully submitted this 11th day of April 2008:

LEWIS AND ROCA LLP

SPECIAL ORDER SYSTEMS

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